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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**RICARDO PEREZ CAMPOS and GERARDO  
GONZALEZ** *individually and on behalf of  
others similarly situated,*  
*Plaintiffs,*

**NOTICE OF MOTION TO STRIKE  
DEFENDANTS' ANSWER AND TO  
ENTER DEFAULT**

-against-

**Index No. 16-cv-05303-DLI-RER**

QUENTIN MARKET CORP. (d/b/a  
QUENTIN MARKET), WON KE LEE, SEAN  
OH, and SUSAN JONG LEE.

*Defendants.*

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**NOTICE OF MOTION**

Please take notice that, upon the annexed declaration of Colin Mulholland, Esq., and attached exhibits, and all prior papers and proceedings in this case, the Plaintiff, by counsel, will move the court, at such time and date as the Court may designate, pursuant to Fed. R. Civ. P. 55(b) (2) and Local Rule 55.2(b), for an order striking the Defendants' answer for failure to defend this action and to enter a default judgment against the Defendants, and such other and further relief this Court deems just and proper.

Answering papers, if any, shall be served on the undersigned no later than September 22<sup>nd</sup>, 2017 as directed by Magistrate Judge Ramon E. Reyes on docket entry 28 and 29, or at such other time as the court may direct.

Dated: New York, New York  
August 24, 2017

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: /s/ Colin Mulholland, Esq.  
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